

September 28, 2015

Attention: Peter Eichar
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Re: PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006, HGVS

Dear Mr. Eichar:

The mission of The Escondido Creek Conservancy (TECC) is to preserve and restore the Escondido Creek watershed. Our vision is that the watershed, which extends from Bear Valley and Lake Wohlford to the San Elijo Lagoon and includes most of the city of Escondido, will become a model of vibrant urban communities and viable natural ecosystems thriving together. To accomplish this requires sound planning and development, sensitive to, and appreciative of, our natural resources. Unfortunately the Harmony Grove Village South (HGVS) project fails this test.

TECC does not dispute the need for more housing. We support, in general, the current County General Plan especially those aspects that came together as a result of many years of careful discussions and are supported by thoughtful studies and community consensus. Unfortunately, the HGVS was subject to a last-minute owner-initiated up zone request (SD-7, post BOS approval of the GP) that undermined the \$18 million and decade-long process to update the general plan (See attached letter from the Elfin Forest Harmony Grove Town Council). TECC opposes the HGVS project as it will produce tremendous negative impacts in our communities and diminish our quality of life, natural habitats and transportation systems, while increasing the cost of public services and the risk of fire.

Biology and Open Space Habitat Preservation

Residents adjacent to the HGVS property regularly observe significant wildlife foraging on and near this property, including deer, bobcats, coyotes, numerous raptors (golden eagles, red tail and cooper hawks), California gnatcatchers, western red diamond rattlesnakes, and horned lizards on the project site. There is the possibility that

The Escondido Creek Conservancy (TECC) is a non-profit, public benefit corporation whose mission is to protect and restore the Escondido Creek watershed.

Stephens kangaroo rats inhabit the property as well, based on MSCP habitat modeling and observations by local residents of possible SKR dens.

While we often think that preservation is about protecting threatened and endangered species, we must recognize that keeping common species common is one of the keys to protecting complete ecosystems and preserving threatened and endangered species.

At least \$60 million, largely public funding, has been spent in the past decade to purchase and preserve habitat lands in the areas near HGVS in the "gnatcatcher core" of the north county multiple species conservation plan. As included in the original staff recommendation to the updated general plan, the HGVS site would have supported approximately 25 homes. That number, developed as a result of a thoughtful and fair process to update the general plan, could result in a development sensitive to the site and designed in a manner compatible with protecting the major investment that taxpayers have previously made in the area to preserve and protect habitat lands.

Now, instead of the number that the professional planning staff had recommended, the current proposal to site 453 homes adjacent to sensitive open space will create numerous severe detrimental impacts to preserved lands and will forever alter community character in Harmony Grove and Elfin Forest. By allowing this development to move forward, the County will undermine the previous \$60 million investment as preserved lands, including investments by County Parks and Recreation, will become more expensive to manage.

This project shares borders with four parcels of preserved open space, including land owned by TECC, and is contiguous with more than 1,600 acres of preserved land. The impacts of this project on these lands must be addressed in the Draft EIR, including:

1. **Introduction of invasive exotic species**, both plants and animals, inadvertently carried to adjacent preserved lands from bikes, people, animals or spread from backyards or fuel modification zones adjacent to nearby preserved lands. *How will this be addressed in the Draft EIR?*
2. **Companion animals** (pets) which can act as predators of and competitors with native wildlife, as well as vectors for disease. *How will the impacts of free ranging domestic animals be addressed in the Draft EIR?*
3. **Use and creation of undesignated trails** associated with new residents can significantly degrade the natural environment. *How will the impacts of undesignated trails be addressed in the Draft EIR?*

4. Influence on earth systems, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution, can affect the natural environment. *How will the Draft EIR address these impacts?*

5. Loss of foraging habitat. Wildlife predators, especially raptors, utilize open areas, and especially the non-native/native grasslands on the property and old agricultural fields for foraging. *How will the Draft EIR propose to mitigate these impacts?*

6. Impacts to local and regional wildlife movement and health. As urban residents move in, they bring with them urban habitats that increase noise and lighting, both of which are known to negatively affect wildlife. Additionally, it is unfortunately common in urban areas to place poison bait stations around developments to control rats and vermin. Studies show that this poison bio-accumulates in wildlife and could be adding to the instability of wildlife populations and affecting more directly certain species like bobcats. *How will the Draft EIR propose to mitigate the impacts to local and regional wildlife movement and health?*

7. Increased land management costs. The siting of dense, urban housing so near protected habitat will affect the level and intensity of management costs for not only TECC, but for County Parks and Recreation, the Center for Natural Lands Management and the Olivenhain Municipal Water District, all of which are local land/open space managers with significant habitat monitoring and protection responsibilities. *How will off-site impacts be addressed in the Draft EIR? Will local agencies and NGO's with land management responsibilities be compensated by the applicant for costs associated with increased management and maintenance of preserved lands? The impact and increased costs to these nearby conservation lands should be studied in the Draft EIR.*

8. Ineffective open space onsite. The open space areas proposed on the project site are too narrow, fragmented, and too close to the development. While they might be nice green space for the residents, as designed, they would not function as viable wildlife habitat and should not be counted as such. Alternative designs should be studied, using the County staff original updated general plan recommended zoning of Sr-2, SR-4, and RL 20, to determine the best layout to allow some development while preserving and restoring more viable habitat, conserving existing critical habitat, minimizing edge effects and enhancing and restoring a riparian area that runs from the southeast portion of the property to western edge of the property at Country Club Drive. *How will this be addressed in the Draft EIR?*

Visual Impacts

From the perspective of CEQA, the term "aesthetics" pertains to the perceived visual quality of an area characterized by one or more visual elements such as an open space,

scenic view, or architecture. Aesthetically significant features can occur in a diverse array of environments, ranging from urban centers to rural agricultural lands to natural woodlands. A project can have significant impacts on visual quality if it negatively affects the aesthetically significant features by altering them in part or wholly, e.g., by destroying vegetation integral to a scenic vista, or by constructing a building in an architectural style that conflicts with the existing setting.

While the developer has posited that somehow the currently under construction Harmony Grove Village project and the proposed Harmony Grove Village South project are in the same area, that HGVS is visually contiguous with HGV, and that HGVS is a simple continuation of HGV, it's important to visit the site to understand the visual context.

The HGVS is separated from HGV by several geographic and geologic features, the most obvious being the Escondido Creek. A visitor to the HGVS today will see construction activity on Harmony Grove Road associated with the HGV development but they would also see a dramatic slope of approximately 60 feet rising from Harmony Grove Road that is currently being lushly landscaped by the HGV developer with native and other trees and plants. Currently no homes or buildings from the HGV site are visible from the valley below. Even with the buildout of HGV, no HGV homes will be visible from the valley. As the landscape matures, it is likely that no buildings of any kind from HGV will be visible from the valley. As planned and now constructed, HGV creates that visual boundary between urban and rural, the urban limit line which was the result of good planning and community consensus referenced in the attached letter.

Unfortunately, rather than being an extension of HGV as the developer has suggested, HGVS, seemingly dropped from the sky, is a dense urban project in a rural and semi-rural area and as such will dramatically negatively affect the aesthetics of the valley. If this project had been proposed along the Escondido Creek Trail within urban Escondido, TECC would most likely be first in line to recommend it be constructed. As designed, it will change the visual character of Harmony Grove irreversibly. It belongs in an urban setting-not in Harmony Grove.

It's important to note that the density of HGVS is significantly higher than the most dense portion of HGV. The densest center of HGV is approximately 8-9 dwelling units per acre of single family residences (5,000 sq ft lots). HGVS proposes densities of 12-13 units per acre, the majority of which are multi-family units. The fact that the applicant is having difficulty locating secondary ingress/egress is evidence in itself that this site is isolated in nature, in spite of the perception that it is "near" infrastructure and amenities. *The impacts to aesthetics associated with the HGVS project could be dramatic and unmitigatable and must be addressed in the DEIR.*

Fire Protection

Wildland fire is a natural event in chaparral. However, the frequency and intensity of fires in San Diego County has increased well beyond the natural cycle due to human activity. Harmony Grove is currently a semi-rural valley with one primary way in and one primary way out. Because of the history of fires in the area, current residents understand they live in a high-fire risk area but also appreciate and respect the rural community and adjacency to preserved lands.

Yet, the applicant is requesting a waiver of secondary ingress/egress standards for this project which, if approved, would have the effect of creating a "shelter in place" community for not only the project, but all existing residences in the valley as even with the current residences in the valley, evacuation can be a difficult. This was clearly demonstrated during the Cocos fire in May of 2014. Evacuation from Elfin Forest and San Elijo Hills communities was made impossible due to grid locked parkways in the San Elijo Hills development. Only a sudden shift in the fire direction saved many residents from being caught in an inferno in their vehicles. Harmony Grove is even more constrained than Elfin Forest and San Elijo Hills from an evacuation standpoint. *The Draft EIR should study the feasibility of the applicant building a project to "shelter in place" standards and bringing all existing structures/residents in the valley up to shelter in place standards at the applicant's cost. Additional consideration must also be given for small and large animal "shelter in place" accommodations, also at the applicant's cost.*

TECC's concern as a land manager is the addition of dense urban-style developments like HGVS in rural and semi-rural areas most likely will result in residents who expect urban-style amenities, services and a more urban lifestyle. Sadly, urban life and wildlife are not compatible. Urban residents, for example, often have a fear of the chaparral and other natural flora and see it as a detriment to their homes. New residents begin to advocate for additional brush clearing to protect their homes from fire. In this view, natural habitat is seen more as fuel than a community asset. Those urban demands will undermine the public investment made in open space preservation as otherwise healthy habitat land must be thinned to provide fire breaks to new homes. Obviously if fewer homes were constructed, it would be easier to evacuate those homes in case of fire and easier to prevent and manage fires in the area. *How will these issues be addressed in the DEIR?*

Circulation Plan

There has been discussion in the community, most recently before the San Dieguito Planning Group on 9/24/15, about the applicant's efforts to secure secondary access for the project. We have heard references to potential secondary access from the site out to Johnston Road and/or to Del Dios Highway. If the applicant is assuming they can secure secondary access across the nearby TECC-owned property to Johnston Road, the DEIR must consider alternatives as TECC will not provide such access. Additionally, TECC would oppose secondary access to Del Dios Highway as the environmental impacts would be devastating. *If these are in fact the routes that the applicant is reviewing, the DEIR must fully examine alternatives to these choices.*

Air Quality

In spite of the project being represented as "near" existing infrastructure, it will function as a motor vehicle dependent community, thereby contributing to increased GHG and violating AB 32 as well as executive orders regarding emissions issued by governors Brown and Schwarzenegger. This contributes to faster and more dramatic climate change, which alters the habitat on preserved lands. Further the courts have ruled the County's carbon reduction plan as insufficient to meet stated goals. How communities are planned, and most critically, sited, relate directly to use and development of efficient transportation. *How will the DEIR address compliance with AB 32, and other GHG regulations?*

If the project were built to the County Planning staff's original recommended general plan density, all the issues mentioned above could be ameliorated as a project could be designed which was sensitive to the landscape and nearby preserved lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Barnard', with a stylized flourish at the end.

Kevin Barnard
President

Attachment